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November 18, 2019

Via ECF

Hon. Edgardo Ramos  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

## MEMO ENDORSED

USDC SDNY  
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ELECTRONICALLY FILED  
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DATE FILED: November 18, 2019

Re: Caridad Hichez v. Saul  
19 Civ. 5493 (ER)

Dear Judge Ramos:

I am joining Mr. Kuznicki as co-counsel for the plaintiff in the above-captioned case. I write to request an extension of time in which to file plaintiff's Motion for Judgment on the Pleadings. Plaintiff's papers are due to be filed today. This is plaintiff's first request for an extension of time.

Due to workload considerations, we are behind schedule in preparing Mr. Caridad Hichez's case and cannot complete our preparation today. We regret that we need to seek additional time to prepare these papers. With the kind consent of opposing counsel, Emily Fishman, Esq, I request the following revised schedule:

December 18, 2019	Plaintiff's Motion for Judgment on the Pleadings
February 17, 2020	Defendant's Opposition. Cross-Motion for Judgment on the Pleadings
March 10, 2020	Plaintiff's Reply Brief
March 30, 2020	Defendant's Reply Brief

Thank you for Your Honor's attention to this matter.

Very truly yours,

/s/ Christopher J. Bowes  
Christopher J. Bowes, Esq

cc: AUSA Emily Fishman  
Assistant Regional Counsel  
SSA/Office of the General Counsel – Region II  
26 Federal Plaza, Room 3904  
New York, NY 10278  
Attorney for Defendant

David Kuznicki, Esq.  
Attorney for plaintiff

The application is  granted  
 denied

  
Edgardo Ramos, U.S.D.J  
Dated: November 18, 2019  
New York, New York